

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

JAROSLAV HORNOF, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	No. 2:19-CV-198-JDL
	)	
UNITED STATES OF AMERICA,	)	
	)	
<i>Defendant.</i>	)	

**UNITED STATES' CONSENT MOTION SEEKING A TWO-WEEK  
EXTENSION TO FILE ITS REPLY MEMORANDUM, TO RESPOND TO  
PLAINTIFFS' STATEMENT OF MATERIAL FACTS, AND TO RESPOND TO  
PLAINTIFFS' REQUESTS THAT MANY OF THE UNITED STATES'  
STATEMENTS OF FACT BE STRICKEN**

With plaintiffs' consent, the United States respectfully requests a two-week extension to file its reply memorandum to Plaintiffs' Objection to the United States' Motion for Summary Judgment, to respond to Plaintiffs' Statement of Material Facts, and to respond to plaintiffs' requests that the many of the United States' statements of fact be stricken under Local Rule 56(e).

Plaintiffs requested and received three additional weeks to file their opposition brief, to which the United States did not object. In addition, plaintiffs filed a substantial volume of new materials in connection with that brief, to which the government seeks to meaningfully respond.<sup>1</sup>

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<sup>1</sup> See ECF Nos. 163-1 (Int'l Convention for the Prevention of Pollution of the Sea by Oil, 1954), 163-2 (48 F.R. 45704), 163-3 (Marpol excerpt, Chap. 3—Requirements for machinery spaces of all ships), 163-4 (Excerpt, Int'l Convention for the Prevention of Pollution from Ships, 1973), 163-5 (Legislative History, 1973 IMCO Conference on Pollution from Ships), 164-1 (Excerpt, Int'l Convention for the Prevention of Pollution from Ships, 1973), 164-2 (Treaty with Czech Republic on Mutual Legal Assistance in Criminal Matters & Mutual Legal Assistance: Instrument Between the United States of America and the Slovak Republic), 164-3 (Decl. Elaine Akers),

The United States' reply memorandum and related materials are presently due on or before September 14, 2022. An extension of this deadline until September 28, 2022, will enable the government to more meaningfully respond. Plaintiffs, through counsel, have no objection to the instant request for additional time.

WHEREFORE, the United States respectfully requests an extension of two weeks to file its reply memorandum and related materials, through and including September 28, 2022.

Dated: September 8, 2022

Respectfully submitted,

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164-4 (Decl. George Chalos), 164-5 (Decl. Jaroslav Hornof), 164-6 (Decl. Damir Kordic), 164-7 (Decl. Bruce Merrill) and 164-8 (Decl. Lukas Zak).

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